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FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

ANTONIO TEIXEIRA,

Defendant

CRIMINAL NO. RDB-21-0139

UNDER SEAL

(Possession of a Firearm and
Ammunition by a Prohibited Person,
18 U.S.C. § 922(g)(1); Possession with
Intent to Distribute a Controlled
Substance, 21 U.S.C. § 841(a);
Possession of a Firearm in
Furtherance of a Drug Trafficking
Crime, 18 U.S.C. § 924(c); Aiding
and Abetting, 18 U.S.C. § 2;
Forfeiture, 21 U.S.C. § 853, 18 U.S.C.
§ 924(d), 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

(Possession of a Firearm and Ammunition by a Prohibited Person)

The Grand Jury for the District of Maryland charges that:

On or about October 17, 2020, in the District of Maryland, the defendant,

ANTONIO TEIXEIRA,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, to wit, Springfield Armory, XD-40, semi-automatic pistol bearing serial number MG109677; and 16, rounds of .40 caliber ammunition; and the firearm and ammunition were in and affecting commerce.

18 U.S.C. § 922(g)

COUNT TWO
(Possession with Intent to Distribute Fentanyl)

The Grand Jury for the District of Maryland further charges that:

On or about October 17, 2020, in the District of Maryland, the defendant;

ANTONIO TEIXEIRA,

did knowingly and intentionally distribute and possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as fentanyl), a Schedule II controlled substance.

21 U.S.C. § 841

18 U.S.C. § 2

COUNT THREE

(Possession of a Firearm in Furtherance of Drug Trafficking)

The Grand Jury for the District of Maryland further charges that:

On or about October 17, 2020, in the District of Maryland, the defendant,

ANTONIO TEIXEIRA,

did knowingly possess a firearm, that is, a Springfield Armory, XD-40, semi-automatic pistol bearing serial number MG109677, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as fentanyl), as charged in Count Two of this Indictment, which is incorporated by reference herein.

18 U.S.C. § 924(c)

FORFEITURE

The Grand Jury for the District of Maryland further finds that:

1. All allegations set forth in Counts One through Three are hereby incorporated by reference;

2. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendant(s) that the United States will seek forfeiture as part of any sentence in accordance with 21 U.S.C. § 853, 18 U.S.C. § 924(d), and 28 U.S.C. § 2461(c) in the event of the defendants' convictions.

Narcotics Forfeiture

3. Pursuant to 21 U.S.C. § 853(a), upon conviction of an offense in violation of the Controlled Substances Act, as alleged in the Narcotics Count(s), the defendant(s) convicted of such offense(s), shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense(s); and
- b. any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, such offense(s).

Firearms and Ammunition Forfeiture

4. Pursuant to 18 U.S.C. § 924(d), upon conviction of an offense(s) alleged in the Firearms Count(s), the defendant(s) convicted of such offense(s) shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c), and any other statutes cited herein, any firearms and ammunition involved in those offense(s).

Substitute Assets

5. Pursuant to 21 U.S.C. § 853(p), if any of the property described above as being subject to forfeiture, as a result of any act or omission by the defendant(s):

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the defendant(s) up to the value of the property charged with forfeiture in the paragraphs above.

Property Subject to Forfeiture

- 6. The property to be forfeited includes, but is not limited to, the following:
 - a. a Springfield Armory, XD-40, semi-automatic pistol bearing serial number MG109677; and
 - b. approximately 16 rounds of .40 caliber ammunition.

21 U.S.C. § 853
18 U.S.C. § 924(d)
28 U.S.C. § 2461(c)

Jonathan F. Lenzner/amm
Jonathan F. Lenzner
Acting United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

4/29/2021
Date